

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DINAR CORP, INC., a Nevada corporation;
and HUSAM TAYEH, an individual,

Plaintiffs,

vs.

STERLING CURRENCY GROUP, LLC,
dba DINAR BANKER; TYSON RHAME;
FRANK BELL; JORDAN BLISS;
MATTHEW ADAMS; and MARK DILEO,

Defendants.

No. 1:14-cv-00714-AT

**RESPONSE TO DEFENDANTS STERLING CURRENCY GROUP, LLC,
TYSON A. RHAME, FRANK BELL, JORDAN DOE, AND MATTHEW
ADAMS' MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION
TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Dinar Corp, Inc. ("DCI") and Husam Tayeh ("Sam") (collectively "Plaintiffs"), by and through undersigned counsel, respectfully request that the Court deny the above-referenced motion filed by Defendants (the "Motion") because (1) Defendants' attempt to argue the merits of Plaintiffs' Motion for Preliminary Injunction (the "Application") is improper, in addition to being riddled with misstatements; (2) given the nature of Plaintiffs' allegations in the Application and Defendants' previous allegations and continued position that "they

have never seen any evidence . . . that Sterling Currency Group or any associated individuals have defamed Dinar Corp,” **Defendants should not need proof to substantiate the truth of the allegations they claim they already had**; and (3) Defendants are free to present any evidence they *MIGHT* find at the evidentiary hearing on Plaintiffs’ Application, **rather than delay *the process of setting the urgently needed evidentiary hearing.***

Contrary to Defendants’ arguments, Plaintiffs were unable to file the Application three months ago due to a multitude of reasons, including personal reasons, which Plaintiffs need not address here. In short, concerning all of the circumstances, including Plaintiffs’ efforts to avoid having the Court impose on Defendants the fairly basic limitations to which any reasonable person would not hesitate to agree, in addition to the depth of the Application, a mere three months is not unreasonable.

Additionally, Defendants once again failed to even consider attempting to narrow the scope of the proposed form of injunction, which is already very narrowly tailored to address Plaintiffs’ concerns without needlessly causing any undue burden on Defendants.

Therefore, based upon the foregoing, Plaintiffs respectfully request that the Court enter an order denying the Motion, or, in the alternative, proceed with setting a scheduling conference so an evidentiary hearing on Plaintiffs' Application can be set as soon as possible, and granting such other and further relief as the Court finds reasonable and necessary.

Respectfully submitted this 5th day of December, 2014.

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*Attorneys for Plaintiffs Dinar Corp., Inc.
and Husam Tayeh*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading, on the date stated below, was filed with the Clerk of the Court using the CM/ECF system, which automatically and contemporaneously sends electronic notification and a service copy of such filing to the following counsel of record:

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Dated: December 5, 2014.

/s/Daniel R. Warner
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